

CONDENSED TRANSCRIPT

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

DOUGLAS W. BAILLIE,

Plaintiff,

vs.

No. C-1-02-062

CHUBB & SON INSURANCE,

Defendant.

The telephonic discovery deposition of GREGORY W. TAZIC taken in the above-entitled cause, before LISA A. MONDELLI, a notary public of DuPage County, Illinois, on the 5th day of September, 2003, at 500 Park Boulevard, Suite 600, Itasca, Illinois, at 1:00 p.m., pursuant to Notice.

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Exhibit K

DEPOSITION OF GREGORY W. TAZIC - September 5, 2003

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1 no longer the co-chair?

2 A. To my recollection, it still
3 exists.

4 Q. Do you know who the current
5 co-chairs would be?

6 A. I believe Diane Haggard is
7 still involved in it. Other than
8 that, I don't know.

9 Q. What was Diane Haggard's
10 role at the Cincinnati branch during
11 the time that you served as the
12 regional claim manager?

13 A. For a portion of it, she
14 was the human resource manager and I
15 -- I believe when I first arrived she
16 was an underwriting manager.

17 Q. At the time that you left
18 in March of '03, was she still
19 serving as the H.R. manager?

20 A. Yes.

21 Q. Do you recall whether or not
22 you ever complained to Diane Haggard
23 in some manner regarding Doug Baillie?

24 A. Yes.

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1 with the first one that you recall
2 and tell me what complaint you made
3 to Diane Haggard regarding Doug
4 Baillie.

5 A. Well, like I said, I don't
6 -- I didn't specifically recall which
7 or what instances I had a
8 conversation with Diane about but
9 there were a couple of occasions in
10 which there were things that occurred
11 that I may have talked to Diane about
12 because there are things they just
13 kind of stick out in my head today.

14 Q. Tell me what things stick
15 out in your head.

16 A. No particular order. The
17 first time -- or one of the things
18 that just really stuck out was one of
19 the first renewal CIS meetings that
20 Dieter Korte, who was the CIS
21 regional manager I believe at the
22 time --

23 Q. I'm having a little trouble
24 hearing you. Peter who?

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1 Q. What do you recall?

2 A. I recall some instances in
3 which I would have spoken to Diane
4 about or possibly, you know, kind of
5 express some frustration to her about
6 how some things that I had seen were
7 what I would consider in my opinion
8 not appropriate for the branch manager
9 or regional branch manager.

10 Q. If I understand you, you're
11 saying on more than one occasion you
12 complained to Diane Haggard about Doug
13 Baillie?

14 A. Unfortunately I didn't keep
15 records of every time that I had a
16 conversation with Diane about Doug,
17 but there would have been more than
18 one occasion in which I would have
19 had a discussion with her about
20 things that occurred and my
21 perceptions of his lack of leadership
22 ability.

23 Q. Well, presuming that there's
24 more than one and why don't you start

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1 A. I'm sorry. Dieter.

2 Q. Oh, Dieter.

3 A. And he was conducting a
4 region -- a renewal meeting in his
5 department. And at that time, if I
6 recall, it was during the kind of it
7 was a big deal because they were
8 trying to -- CIS had been
9 unprofitable and they were trying to
10 turn around, get some rate, really
11 one of the first, you know, trying to
12 be the leader to move from the soft
13 market, you know, try to push rates
14 back up.

15 And during that
16 meeting, Doug walked in, in --
17 actually in the middle of conducting
18 it and had started reading a magazine
19 or a newspaper.

20 And I actually happened
21 to be sitting at one end of the
22 table where he was, and he flips
23 through the paper or the news -- and
24 on it -- it was just closes it up,

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1 A. Yes.
2 Q. What was that?
3 A. That actually was -- as I
4 said, that occurred a little bit
5 later on. That -- it was actually
6 -- there were several meetings leading
7 up to that with some folks from home
8 office about from an underwriting
9 perspective, what Pontzer meant,
10 things that they can do.
11 This was the -- kind of
12 the A meeting after a few initial
13 ones that they had in home office
14 with several of the underwriting
15 folks. I think -- I'm trying to
16 remember who else went. Doug went to
17 that meeting.
18 Q. You're talking about this
19 home office strategy session?
20 A. If that was -- yes. I
21 don't know what the meeting was
22 called but there was a meeting at
23 home office in which I know that like
24 some of the underwriters went, Doug

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1 A. There were some discussions
2 with Doug about what was going on
3 with Scott-Pontzer and the things that
4 underwriting was doing, yes, were
5 doing.
6 Q. You described him as not
7 being fully engaged -- or not very
8 engaged I believe was the word you
9 used, but you did have some
10 interaction with Mr. Baillie regarding
11 the Scott-Pontzer and the Ohio UM
12 issue?
13 MR. MONTGOMERY:
14 Objection, asked and answered.
15 MR. NAPIER: Q. Was
16 that correct?
17 A. Yes, I did have interaction
18 with Doug about that, yes.
19 Q. All right. Other than this
20 Scott-Pontzer issue, were there any
21 other instances in which you felt Mr.
22 Baillie -- Mr. Baillie showed a lack
23 of leadership or engaged in
24 inappropriate behavior as a regional

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1 went --
2 Q. Did you go?
3 A. No, I didn't go to that
4 one. I had actually been in home
5 office like two prior meetings on --
6 or actually I had been to home office
7 once before on this with several
8 world-wide underwriting managers and
9 then -- and claims folks and then we
10 also had some of the underwriting
11 managers out in the Ohio Valley and
12 had done kind of an update and things
13 that were going on.
14 So at this particular
15 meeting, I had a discussion with my
16 -- or a discussion with one of the
17 managers in home office and claims
18 and the idea was, you know, it
19 probably wasn't necessary for me to
20 go at that point.
21 Q. Did Doug -- did Mr. Baillie
22 interact with you during the
23 development of an Ohio uninsured
24 motorist strategy, so to speak?

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1 or branch manager?
2 A. Other than the other
3 instances that I've listed?
4 Q. Correct.
5 A. Those were the ones that
6 stand out in my -- in my head.
7 Q. Regarding the Scott-Pontzer
8 matter and how you viewed Mr. Baillie
9 as not being very engaged, did you
10 ever complain to Diane Haggard about
11 that?
12 A. I specifically do not
13 recall; although, I may have.
14 Q. Do you recall whether or not
15 you ever complained to Tim Szerlong
16 about Doug Baillie?
17 A. I don't recall complaining
18 to Tim Szerlong about Doug Baillie.
19 Q. Do you know whether you ever
20 complained to Jim Ekdahl regarding
21 Doug Baillie?
22 A. I don't recall a
23 conversation with Jim; although -- I
24 -- I don't think I would have said

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